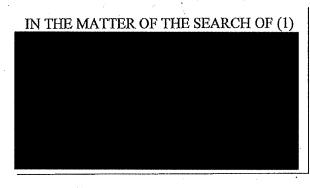
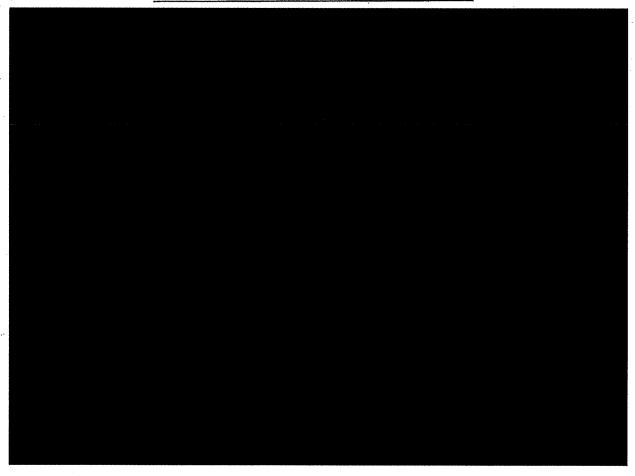
UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

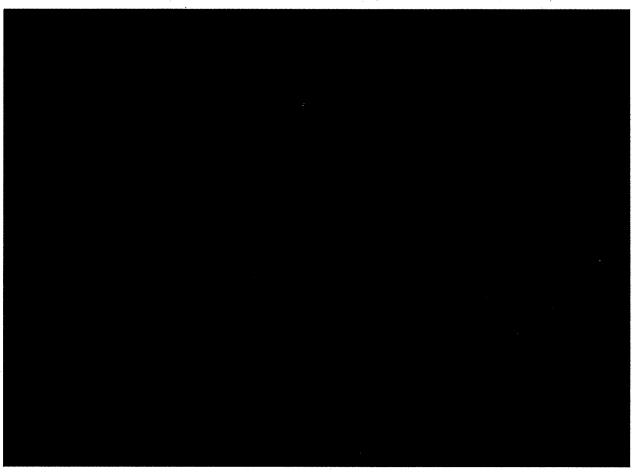


Case No. 3:21-MJ-2055

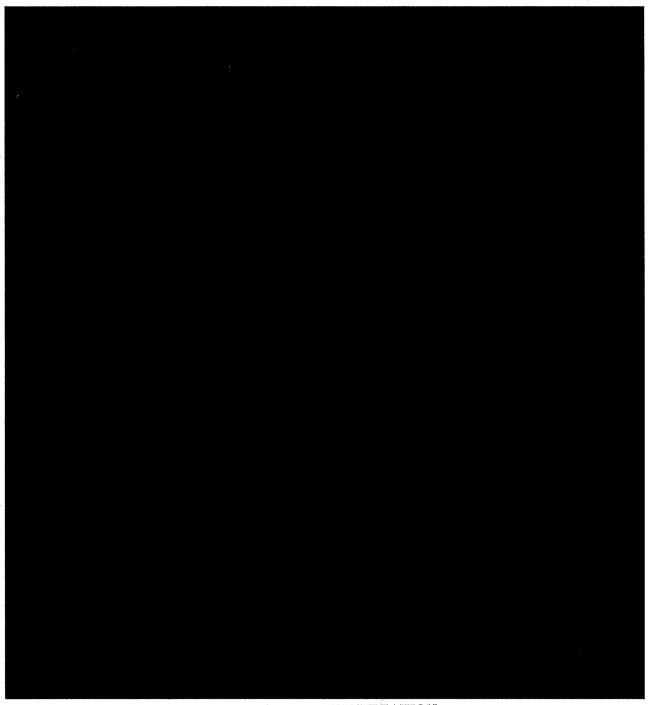
Filed Under Seal

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT





- 3. I submit the facts in this affidavit establish probable cause that evidence, fruits, and/or instrumentalities, specifically described in Attachment B, of violations of 18 U.S.C. § 2339B (Material Support to a Designated Foreign Terrorist Organization) involving BENJAMIN ALAN CARPENTER will be found at the Subject Property.
- 4. According to records from the Tennessee Department of Motor Vehicles, CARPENTER is 31 years old and his primary residence is the **Subject Premises**. CARPENTER's presence at the **Subject Premises** has been confirmed by recent law enforcement surveillance conducted as recently as March 22, 2021. According to CARPENTER's passport, he is a U.S. citizen.



SUMMARY OF THE INVESTIGATION

9. As described in more detail below, CARPENTER is the leader of Ahlut-Tawhid Publications ("ATP"), an international organization dedicated to the translation and publication

of pro-Islamic State of Iraq and al-Sham ("ISIS") and official ISIS media in English. From at least 2017 to the present, CARPENTER, and other ATP members working at CARPENTER's direction, have translated, edited, and published pro-ISIS and official ISIS media through ATP, some of which was co-branded with official ISIS media organizations. CARPENTER, as the leader of ATP, specializes in translating pro-ISIS and official ISIS media content in English. As the leader of ATP, CARPENTER supervises and edits translations performed by ATP members, is recognized by fellow ATP members for his specialized skill in translating, and regularly criticizes English translations of ISIS material published by organizations other than ATP.

10. As described in more detail below, beginning in January 2020, CARPENTER began providing English language translations of official ISIS media content in Arabic for ISIS. CARPENTER provided these English translations to FBI OCE 1, whom CARPENTER believed was affiliated with an official ISIS media organization. On or about February 14, 2021, CARPENTER provided an English language translation of an ISIS video titled, "Bleeding Campaigns" to FBI OCE 1, believing that the translation would be used by ISIS.

PROBABLE CAUSE

I. BACKGROUND ON THE ISLAMIC STATE OF IRAQ AND AL-SHAM

11. On or about October 15, 2004, the U.S. Secretary of State designated al-Qaeda in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization ("FTO") under Section 219 of the Immigration and Nationality Act ("INA") and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant ("ISIL") as its

primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham ("ISIS" — which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-'Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

- 12. Based on my training and experience, I am aware that ISIS and other FTOs have official media components that produce and disseminate official communications. For example, I know that the media components of al-Qaeda in the Arabian Peninsula ("AQAP") and ISIS have produced high quality magazines (e.g., Inspire and Dabiq) and the media components of ISIS have used high quality editing, graphics, and music to produce videos to inspire others to commit violence in the name of ISIS, recruit individuals to join ISIS, and to terrorize citizens living in the United States and other countries. ISIS's official media components include, among others, Al-Furqan Foundation for Media Production and its subsidiaries, including al-Bayan Radio and al-Naba, which will be further discussed in this affidavit.
- 13. I am also aware that ISIS uses its respective media components to, among other things: recruit fighters and other personnel; solicit donations and financial support; call for attacks in the West and against other governments and civilian populations deemed enemies of ISIS; intimidate governments, private entities and civilians that do not share ISIS's violent jihadist philosophy; and claim responsibility for terrorist attacks.
- 14. Based on my training and experience, I am also aware that ISIS members have used social media platforms, video-sharing sites, blogs, and other internet-based sites and applications to distribute their official communications inexpensively, safely, and broadly. In

addition, I am aware that ISIS and other FTOs use these online tools to communicate (publicly and privately) with sympathizers and potential recruits, and to distribute their respective messages to legitimate media outlets, in order to draw attention to the organizations, recruit new members, raise money, and promote violent jihad, all in an effort to carry out the terrorism-related goals of the organizations:

- 15. In August 2015, Al Himmah Library, an official media operation for ISIS, published a document on the internet titled, "You are Mujahid, O Media Man," about the importance of ISIS propaganda. In the publication, ISIS proclaimed, "the media has far-fetched impact in changing balances of battles waged ... because the media publishes or disseminates the victories of Muslims against their enemies, shows support for them, and their heroism in addition to bestowing praise on them. These issues are bound to invigorate the mujahidin²"
- 16. In this same publication, ISIS further proclaimed that the "jihadi media" is "no less important than engaging in battle," and argued that it "is necessary to attain media victory to go along [with] the escalating military victory." The publication equated the importance of ISIS's military victory and victory in the "propaganda war that the Crusader US and its allies are waging against the Islamic State," arguing that "(half the battle) is a media battle" and "the power of words is sharper (stronger) than atomic bombs." The publication repeatedly equated the work of ISIS propagandists to ISIS soldiers waging violent jihad: "Inciting jihad is equal to (waging) jihad ... He who incites (people) is a mujahid in the cause of Allah Almighty. He will

¹ According to open source information, the Al Himmah Library is the official media arm of ISIS responsible for the release of written material.

² Mujahidin is often used to refer to guerilla fighters in Islamic countries.

earn the same wages like the brother who goes into jihad...." Towards the end, the publication again declared, "So, my dear unknown media soldier, know how valuable your role is in attaining victory.... [Y]ou are a mujahid for the cause of Allah..."

17. To succeed in the media battle, the publication instructed the "jihadi media" to "frighten [the infidels], threaten them with death, manifest their defects, and expose their suspicions. Simultaneously, the morale of the soldiers is to be elevated, the news of their victories disseminated." And it described the tasks of the jihadi media and necessary effort to accomplish ISIS's goals:

It is no secret-brother media man-that your jihad by the spoken word is not limited to talking only, but also includes statement, written word, printed word, audio clips, and the preparation of the scenarios for the releases... etc. All these require exertion of immense physical effort.

- 18. According to the publication, this task was not "simple" but required an "army of media men" who disseminated "jihadi media news" on "electronic websites."
- 19. The publication further instructed propagandists to obey ISIS media officials: "Therefore, if you obey him [the media official], you obey Allah; and if you disobey him, you disobey Allah."

II. BACKGROUND OF THE INVESTIGATION

20. In March 2015, in the Northern District of Illinois, the FBI arrested Hasan Edmonds ("Hasan") and Jonas Edmonds ("Jonas") for conspiring to provide material support to ISIS. Prior to their arrest, an FBI undercover employee ("UCE") met with Jonas. Jonas told the UCE that "Abu Hamza" was someone who could help plan an attack. The FBI executed a search warrant of Jonas's cell phone following his arrest. This search warrant revealed January 2015 text messages with a phone number registered to a family cell phone plan subscribed to

CARPENTER's mother. Jonas had CARPENTER's phone number saved in his contacts as "Abu Hamza Al Amriki." I know from discussions with other FBI agents that "Al Amriki" translates as "the American."

- 21. Telephone records provided by CARPENTER's cell phone provider in May 2015 showed six text messages between CARPENTER and Jonas following the UCE meeting. On the day after the meeting between Jonas and the UCE, Jonas informed the UCE that he discussed the attack with Abu Hamza as a potential supporter but that Abu Hamza was not going to be able to help with the attack due to a "propaganda war" Abu Hamza engaged in. Jonas also told the UCE that Abu Hamza asked him to film his attack on a military facility in Illinois and to provide the footage to Abu Hamza, so that Abu Hamza could publish it online. Jonas added that Abu Hamza was known for posting ISIS videos online and had a connection to "bros on that side who post videos," which agents assessed to mean overseas ISIS members. Jonas also described Abu Hamza as a "webmaster." According to Jonas, Abu Hamza told him that if he got Abu Hamza the footage, Abu Hamza could get the footage to "them." Based on discussions with other agents, it is likely that "them" referred to overseas ISIS members.
- 22. In May 2015, in connection with the investigation described above, law enforcement personnel executed a search warrant at CARPENTER's residence in Virginia, where he was living at that time. During the search, agents located a spiral notebook in which the top of the first page read, "Book of Jihad," and which contained notes about the requirements, commandment, meaning, and virtues of jihad. The first pages contained notes from the book, "Mashari al-Ashwaq ila Masari al-Ushaaq" by Abi Zakaryya Al-Dimashqi al-Dumyati. I know from experience and from talking with other law enforcement officers that the

most well-known English rendition of this publication was prepared by Anwar al-Awlaki and is commonly referred to as the "Book of Jihad."³

- 23. Another section of the notebook found during the search of CARPENTER's residence focused on the meaning of jihad, specifically how directly connected jihad had to be to the cause of Islam. It read, "... it must be directly connected. You can't say you are engineer + that is jihad / must be something that helps and supports the cause."
- 24. Agents also searched CARPENTER's phone pursuant to a search warrant and located numerous messages between CARPENTER and a female United Kingdom resident. In these messages, CARPENTER expressed interest in traveling overseas to join ISIS. For example, CARPENTER stated, "The plan is still to [airplane emoji]" and "You gon buy me a ticket n call the passport agency to tell them to hurry up ... I'm bout to apply for passport quicker [3 knife emojis]."⁴

³ Awlaki was a dual citizen of the United States and the Republic of Yemen. From in or around 2004 to 2011, Awlaki was a resident of Yemen. Awlaki used the internet to post sermons and blog entries in which he justified conducting violent jihad against the United States, United States citizens, and United States inilitary personnel, and attempted to radicalize and recruit followers to engage in violent jihad. On or about July 16, 2010, the U.S. Department of the Treasury announced that Awlaki had been specially designated as a global terrorist under Executive Order 13224 as a "key leader" of AQAP and for "supporting acts of terrorism and for acting for or on behalf of AQAP." On or about September 30, 2011, Awlaki was killed in Yemen.

⁴ These quotes and those that follow include a number of grammar and punctuation errors originally made by the authors, who are quoted without the use of "sic."

- 25. CARPENTER and the United Kingdom resident also discussed several details related to making hijrah, ⁵ including (1) whether Iraq or Syria was the best location for hijrah; (2) risks and complications associated with a female traveling to marry al-Qaeda or ISIS fighters; (3) the process for obtaining passports; (4) whether it was permissible to take out a loan to enable a person to make hijrah when that person had no intention of paying back the loan; (5) risks of being caught by government authorities while trying to make hijrah; and (6) assisting other persons trying to make hijrah. In these messages, CARPENTER and the United Kingdom resident also frequently discussed ISIS news and terrorism arrests, commented on beheading videos, and discussed the use of undercover government personas to build evidence against ISIS fighters.
- 26. In connection with the search, agents interviewed CARPENTER. During this interview, CARPENTER admitted to using a Facebook and Twitter accounts closed for extremist content, including taking ISIS news from Twitter and putting it on Facebook. CARPENTER admitted that he had been in text and app communication with Jonas, although he denied any knowledge of a planned attack. CARPENTER also told agents that the September 11, 2001 attack on the United States was justified.
- 27. In June 2016, agents interviewed CARPENTER again. CARPENTER told agents that he waged jihad with a pen instead of a sword. CARPENTER stated that the Quran is clear on jihad, which he defined as fighting with weapons. CARPENTER said that U.S. civilians

⁵ "Hijrah" is an Arabic term meaning "migration" that historically refers to the journey the prophet Muhammad took from Mecca to Medina in 622. Contemporary use of "hijrah" by Islamic extremist groups normally references the journey of a foreign fighter to join an Islamic extremist group abroad, like ISIS.

should know that they were at war and should expect to be victims of an attack because U.S. policy has led to the deaths of Muslims.

III. AHLUT-TAWHID PUBLICATIONS

ATP. ATP is an international, internet-based organization dedicated to the translation and publication of pro-ISIS and official ISIS media in English and other languages, including edited and translated articles, essays, infographics, and other media. Based on the investigation, it appears that ATP was created in or around July 2017. ATP publications are often posted to ATP's websites hosted by wordpress.com and archive.org, and are disseminated through private groups, chats, direct messages, and other forums on social media and mobile messaging platforms, including Facebook, Twitter, and others. In an article posted to an ATP website in October 2019, the author of the article stated that the goal of ATP's work, as part of the munasirin [supporters], was supporting the din of Allah [teaching of Allah] which directly necessitated supporting the Khilafah State [Caliphate/ISIS]. The author also stated that the light of tawhid [monotheism] and jihad will not be extinguished.

A. ATP Publishes Pro-ISIS and Official ISIS Content in English.

29. Based on an open source review, ATP publishes ISIS-related content most directly through an English-language newsletter "From Dabiq⁶ to Rome." Based on conversations with other FBI agents, I know that the title of this newsletter is a tribute to prior official ISIS media outlets focused on the West. Dabiq was the name of an ISIS magazine published in Syria from 2012-2014 that promoted immigration by Westerners to the Caliphate

⁶ Dabiq refers to the site where ISIS supporters believe the "End of Days" battle will be fought.

and encouraged in-place, lone jihadist attacks. Dabiq magazine was superseded by Rumiyah [Rome] magazine in 2016, which ISIS published to promote small cell attacks primarily in the West.

- 30. ATP's "From Dabiq to Rome" is an English-language magazine circulated in salafi jihadi circles and has been published nearly weekly from December 2017 to December 2019. "From Dabiq to Rome" contained original translations of ISIS publications in a style and format that mirrored ISIS publications. Many issues of "From Dabiq to Rome" appear to contain complete translations of ISIS's official weekly publication, al-Naba.
- 31. Because the propaganda created and distributed by ATP promotes ideologymotivated violence, including violent jihad on behalf of ISIS, ATP members frequently have
 their social media accounts suspended or deleted for violating the Terms of Service on those
 platforms. Accordingly, ATP members including CARPENTER frequently create new accounts
 and profiles to continue dissemination of pro-ISIS and official ISIS media after a prior account
 has been removed.
- 32. In 2018-2019, ATP began publishing audio statements previously released by al-Bayan, an official ISIS media organization. These videos were co-branded, in that the final product prominently displayed both al-Bayan's logo and ATP's logo. To the viewer, the published videos appear to be a joint product of al-Bayan and ATP. The official ISIS audio recordings originally released by al-Bayan, were difficult to locate and did not appear to be available in English. By publishing these al-Bayan audio recordings, ATP made official ISIS content more readily accessible to English-speaking consumers in the West.
- 33. For example, on or about January 24, 2019, an account identified as "AT Media" on the internet-based platform, archive.org, uploaded a short video entitled, "Question on Sitting

Back from Jihad 1080p En." The video contained the logos of both al-Bayan and ATP across the top of the screen. The video posed a question about whether extensive familial obligations could exempt a follower from jihad and provided an answer from deceased former ISIS member Turki al-Bin'ali⁷ that the maslahah [benefit] from jihad was greater than the maslahah from a man providing for familial obligations.

B. CARPENTER is the Leader of ATP.

CARPENTER, using variations of his alias "Abu Hamza," serves as a primary contributor, editor, and advocate for ATP in its mission to publish official ISIS and pro-ISIS content in English. Specifically, and as set forth in more detail below, CARPENTER used his social media accounts and email accounts to create ATP's online blog websites on wordpress.com and archive.org. In addition, CARPENTER used his email accounts to upload ATP publications, including many editions of "From Dabiq to Rome" to ATP websites. Finally, a review of messages in ATP's group on Social Media Application 18 indicates that CARPENTER is the leader of ATP.

⁷ Turki al-Bin'ali was a Bahraini ISIS leader and prominent ISIS ideologue who was killed in May 2017.

⁸ Based on my training and experience, I have learned that Social Media Application 1 is a mobile and desktop messaging application. It can be used on smartphones, such as Apple iOS and Google Android devices, and on laptop and desktop computers, by users to send messages and media to each other. Several newspaper articles have described Social Media Application 1 as the "app of choice" for terrorist organizations, especially ISIS. Social Media Application 1 has advertised that it has never disclosed any user information to third parties, including governments. According to Social Media Application 1, it has accomplished this in part, by using a "distributed infrastructure," which means data is stored in multiple data centers around the world.

- websites created on archive.org and wordpress.com. The primary websites included:
 peopleoftawhid.wordpress.com; ahlutawheed.wordpress.com; and
 ahluttawhidpublications1.wordpress.com. Provider records showed that
 peopleoftawhid.wordpress.com was created in January 2020 by user "Abu Hamzah" with an
 address in Knoxville, Tennessee. These records also showed that a premium account was
 purchased on a credit card issued to CARPENTER. Wordpress.com records also show that ATP
 websites, ahlutawheed.wordpress.com and ahluttawhidpublications1.wordpress.com, were
 created by an individual utilizing CARPENTER's known email addresses.
- 36. Records provided from archive.org show that user "Ahlut-Tawhid Publications," acting through an email account operated by CARPENTER, uploaded numerous files to an ATP website that appeared to contain issues of "From Dabiq to Rome," as well as other files matching ATP publications. For example, three of the files uploaded were named, "FromDabiqtoRome28.pdf," "FromDabiqtoRome29.pdf," and "FromDabiqtoRome30.pdf." Review of corresponding "From Dabiq to Rome" issues #28, #29, and #30, showed the following: (1) an article bearing ATP's logo titled, "The SWORD is a Must / Jihad is a Must;" (2) graphics taken from al-Naba (an official ISIS newsletter) depicting the "Harvest of Soldiers," which is a report of ISIS enemy deaths, injuries, and vehicle destructions; (3) images of soldiers shooting rocket propelled grenades, burning armored vehicles, explosions of the World Trade Center buildings, and ISIS members holding captives by the head; and (4) graphics attributed to official ISIS media outlet, Amaq News Agency.

- 37. FBI OCE 1 is a member of one of ATP's groups on Social Media Application 1.

 As a member of this group, FBI OCE 1 preserved content from over 218,000 ATP group communications in Social Media Application 1 from as early as July 2017.
- 38. The messages captured by FBI OCE 1 reveal that CARPENTER is the administrator of certain ATP groups on Social Media Application 1. CARPENTER assigns tasks in these ATP groups, which other ATP members appear to follow. For example, CARPENTER has tasked other ATP members to conduct translations for ATP; to create posters, videos, and infographics for ATP; to create and join other groups on Social Media Application 1; and to compile ATP records by language.
- 39. The messages captured by FBI OCE 1 reveal that CARPENTER is the most active member, sending more that 55,000 of the messages. A review of these ATP communications reveals that other ATP members acknowledge CARPENTER's leadership role by referring to his alias "Abu Hamza" as the "Emir," or head of the group.
- 40. On or about February 3, 2020, an ATP member in ATP's group on Social Media Application 1 questioned a translation by CARPENTER. When this occurred, another ATP member stated, "It is up to him [CARPENTER] ahki [brother] alhabib ... Abo Hamza is our Amir in the group."
- 41. On or about February 29, 2020, an ATP member of ATP's group on Social Media Application 1 commented on an article posted by CARPENTER but authored by another individual titled, "Mapping the online presence and activities of the Islamic State's unofficial

⁹ Social Media Application 1 allows collections of users to communicate with each other in chat rooms called groups. Groups may be either public or private.

propaganda cell: Ahlut-Tawhid Publications." The article refers to ATP as "AHP." The ATP member commented that the author must have meant, "Abu Hamza pubs," in an apparent reference to the significance played by CARPENTER in ATP.

42. In the Social Media Application 1 messages captured by FBI OCE 1,
CARPENTER also claimed to have offered ATP's translation services for content released by alNaba, an official ISIS newsletter. In a message dated January 2, 2019, CARPENTER told ATP
member, Radwan Dakkak, ¹⁰ that he had contacted "AlMutarjim_Foundation" on Social Media
Application 1 and stated he was from ATP and wanted to do more translations from al-Naba, but
needed help. Al-Mutarjim Foundation is a pro-ISIS media organization focused on
disseminating translations of official ISIS content to broader audiences. The Arabic term AlMutarjim literally means "translator." Dakkak replied that he could message the same contact
and say that he was "Abu Hamzahs friend," so that he could write articles.

¹⁰ On July 2, 2019, Australian authorities arrested Isaac El-Matari and Dakkak on terrorism-related charges. In an interview on this same day, CARPENTER's father told FBI agents that CARPENTER told him that two of his "brothers" had been arrested. CARPENTER told him that one was 20 years old (El-Matari's age) and one was 23 years old (Dakkak's age). According to CARPENTER's father, CARPENTER claimed to have communicated many times with the older arrested person about Islam and CARPENTER believed they had been arrested after planning an attack in Sydney, Australia.

- Media Application 1.¹² During this conversation, which was captured by screenshots taken by FBI CHS 1, CARPENTER sent links to two videos which were co-branded with both ATP's logo and the logo of al-Bayan, an official ISIS media organization, as well as links to ATP's "From Dabiq to Rome" Issues #45 and #47. During these chats, CARPENTER requested translation assistance from FBI CHS 1 regarding a speech by deceased ISIS leader Abu Bakr al-Baghdadi. After FBI CHS 1 provided edits to the translation, CARPENTER critiqued FBI CHS 1's editing method. CARPENTER wanted FBI CHS 1 to use track changes when editing the translation so that CARPENTER could review the edits. Instead, FBI CHS 1 sent CARPENTER a new document with the edits included.
- 44. A review of the communications captured by FBI OCE 1 on Social Media

 Application 1 reveals that CARPENTER is the leader of ATP and is also recognized by fellow

 ATP members for his specialized skill in translating ISIS-related content into English.
- 45. For example, on March 11, 2020, one ATP member asked the group about the meaning of a particular Arabic word. Another ATP member responded, "Ask Abu hamzah." CARPENTER replied with an image of an ISIS flag behind a smiling girl and then posted a long description of the meaning of the word, including the definition of various iterations of the word, synonyms in English, and synonyms in Arabic.

¹² Users on Social Media Application 1 can communicate with each other through chats. They can send each other text messages, photos, videos, any files, and make voice calls.

- 46. On March 27, 2020, after another ATP group member posted a message about Ibn Taymiyyah in English, CARPENTER posted, "Not accurate translation is it akhi."
- 47. On July 5, 2020, an ATP member posted a request for a booklet on a particular topic. After CARPENTER directed the ATP member to an ATP publication, another ATP member made the following post: "Read the refutation on abdur-rahman hassan on the link Abu Hamza sent. Allahuma Barik brother Abu Hamza did good work there on that refutation. Probably the best thing out there in English. [posts link to ATP publication 'Refuting Abdur-Rahman Hasan (the student of 'Ali Hasan') on the Topic of not Ruling by what the Hakam Revealed']."
- 48. A review of communications captured by FBI OCE 1 on Social Media

 Application 1 also reveals that CARPENTER regularly criticized translations performed by other

 pro-ISIS and official ISIS media organizations.
- 49. For example, on April 3, 2020, CARPENTER criticized translations done by 'bro hajji' in ATP's group on Social Media Application 1 by stating, "very bad mistranslation." In response, another ATP member asked CARPENTER what he had planned to do and CARPENTER replied, "crop this clip and expose his jahl bi-ithnillah [ignorance]."
- 50. On April 16, 2020, after another ATP group member on Social Media Application 1 posted a translation posted on the website, http://www.aymennjawad.org, CARPENTER stated, "yeah na'am I will take his translation and edit it in sha Allah / don't share that kafir's blog though" and "his translations have major mistakes in it usually when it comes to these issues."
- 51. On April 17, 2020, an ATP group member on Social Media Application 1 asked three ATP members, including CARPENTER, if his translation was correct and CARPENTER

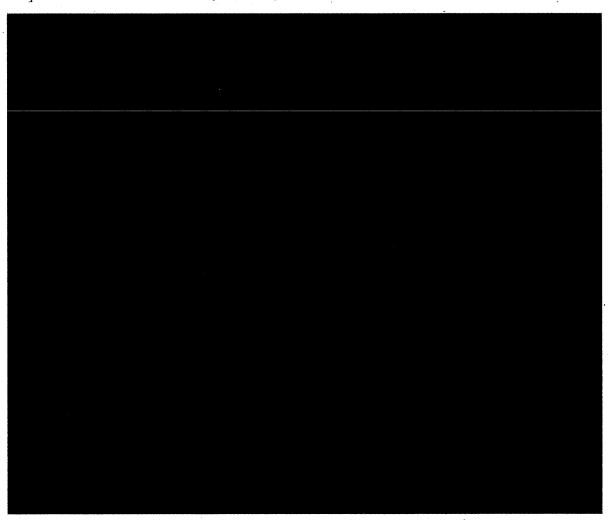
replied, "Correct akhi in sha Allah. / If you would like to check further, send the whole context so we can see what do you intend to say by that."

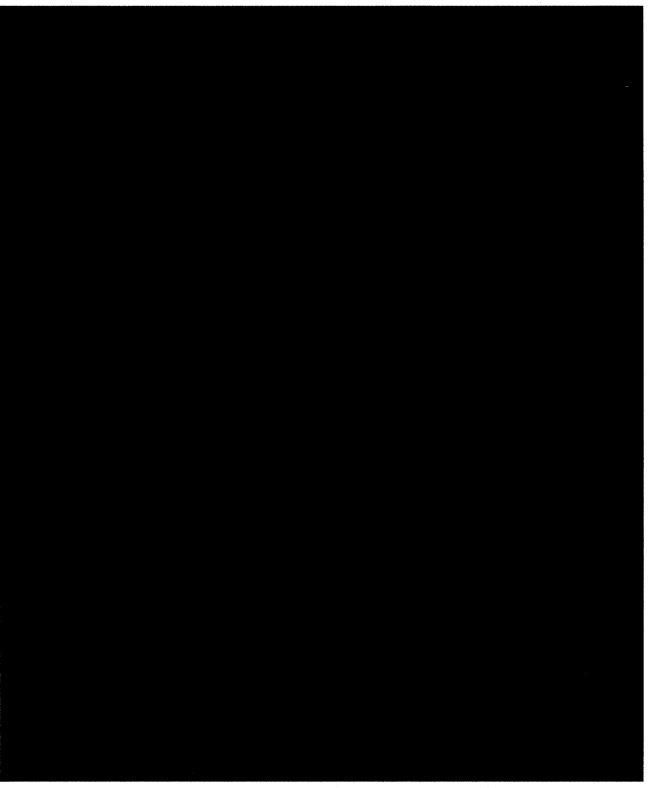
IV. CARPENTER'S TRANSLATION SERVICES FOR ISIS

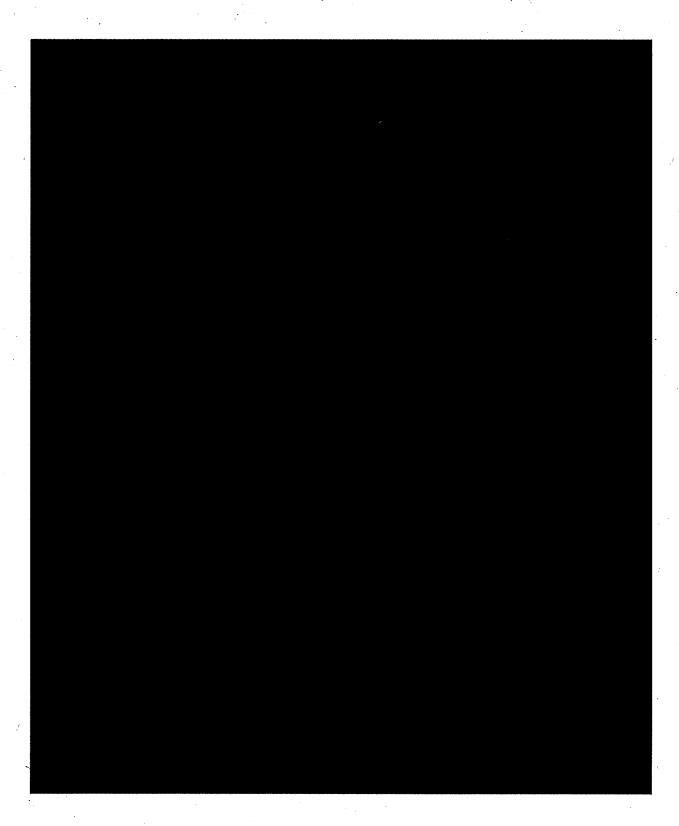
- Application 1. As a member of ATP's group, FBI OCE 1 and CARPENTER interacted on Social Media Application 1. Some of the communications between FBI OCE 1 and CARPENTER were made within the ATP group, while others were exclusively between FBI OCE 1 and CARPENTER. At times described below, some of these direct communications between FBI OCE 1 and CARPENTER. At times described below, some of these direct communications between FBI OCE 1 and CARPENTER occurred within Social Media Application 1's "secret chat" function. During the conversations described below, CARPENTER used Social Media Application 1 usernames "abuh17171," "akhun7," and "ahadtalabah." 13
- maintained connections with the "diwan." I know from conversations with other FBI agents that "diwan" used in the context of ISIS refers to ISIS's centralized organization that produces and initially disseminates official ISIS media content. Specifically, FBI OCE 1 claimed to have connections to an official ISIS media organization ("ISIS Media Organization 1"). FBI OCE 1 further represented to CARPENTER that ISIS had requested that English translations of ISIS content be published through ISIS Media Organization 1.
- 54. Prior to the conduct described below, CARPENTER criticized previous translations published by ISIS Media Organization 1 in his communications with FBI OCE 1.

For example, in September 2019, FBI OCE 1 asked CARPENTER if he ever used translations published by ISIS Media Organization 1. CARPENTER responded, "Use [ISIS Media Organization 1] but they are very rough and need editing / May Allah bless whoever is translating them."

55. In another example, in October 2019, CARPENTER asked FBI OCE 1, "Do we know who or whom is translating Naba articles and the speeches [for ISIS Media Organization 1]?" CARPENTER stated, "They are very poor akhi / We need a major improvement."







- C. CARPENTER Provides English Translation of ISIS Video to FBI OCE 1.
- 65. On or about January 8, 2021, ISIS's central media organization [diwan] released a 25-minute video in Arabic from the Sinai Province entitled, "Bleeding Campaigns." The video documents ISIS's military operations against Egyptian troops and depicts ISIS fighters engaging in battle, detonating improvised explosive devices, firing mortars, and executing a suicide bombing. The video also shows the capture and subsequent executions of three individuals, including one alleged to be an Israeli spy. Finally, in the video, ISIS fighters provide general instructions on the use of a shoulder-fired rocket launcher.
- 66. On or about January 30, 2021, FBI OCE 1 informed CARPENTER that the "diwan" was planning to reinitiate a former official ISIS media organization ("ISIS Media Organization 2"). FBI OCE 1 further advised CARPENTER that the "diwan" wanted ISIS Media Organization 2 to release multiple ISIS videos translated into English, starting with the "Bleeding Campaigns" video. After hearing about the project, CARPENTER replied, "Alhamdullillah [praise be to Allah] that's good." FBI OCE 1 told CARPENTER that the project would get a lot of attention, that the diwan only wanted trusted brothers working on the project, and asked CARPENTER not to tell anyone about the project.
- 67. CARPENTER asked how many translators were working on the project and was told that there was one English translator. CARPENTER then asked, "He [the one translator] does Naba sah [true]." FBI OCE 1 stated that this translator was also responsible for English translations of ISIS's weekly newsletter al-Naba. As discussed previously, CARPENTER knew that al-Naba published ISIS's weekly newsletter and that translators for al-Naba worked for ISIS.
- 68. FBI OCE 1 then asked CARPENTER for assistance with translating videos. CARPENTER initially wrote that he could not do videos, but then added that "it depends."

CARPENTER continued that he preferred to edit from an Arabic transcript, which made it easier.

- 69. I know from speaking with other agents and analysts that ISIS published a series of videos in 2020 titled, "To Be Absolved Before Your Lord." The series was published in parts, including Part 1 by ISIS in Yemen (which distinguished ISIS from AQAP and rebuked AQAP); Part 2 by ISIS in Khorasan Province (which distinguished ISIS from the Taliban and rebuked the Taliban); and Part 3 by ISIS in Somalia (which distinguished ISIS from Shabaab and rebuked Shabaab).
- 70. During the conversation between CARPENTER and FBI OCE 1, CARPENTER stated that the Taliban video should be at the top of the list of videos to be translated. FBI OCE 1 agreed and wrote that the Somalia video should also be included. CARPENTER replied asking if the Yemen video had been translated. From these references and as established in prior conversations between FBI OCE 1 and CARPENTER, I believe CARPENTER was referring to the "To Be Absolved Before Your Lord" series of ISIS videos.
- 71. On or about February 1, 2021, when asked if he could help with the translation of the "Bleeding Campaigns" video, CARPENTER replied, "I'll take a look at it akhi [brother] but I can't promise anything."
- 72. On or about February 2, 2021, CARPENTER requested that FBI OCE 1 send the partially completed English translation of the video to another of his accounts. CARPENTER wrote, "Send it to @Ahadtalabah bro." As will be discussed later in this affidavit, I believe CARPENTER also operates this account. Before sending the file, FBI OCE 1 asked CARPENTER if the file should be sent in a "Secret Chat" on Social Media Application 1. CARPENTER relied, "Yeah."

- 73. Two minutes later, FBI OCE 1 sent a greeting to CARPENTER's other account "ahadtalabah" and received a response. FBI OCE 1 then sent CARPENTER files to download, including an Arabic transcript and a partial English translation of ISIS video "Bleeding Campaigns." Within minutes, CARPENTER replied and stated, "Bro this is very good," and later, "There wouldn't be much editing when he [diwan translator] is finished by the looks of it."
- 74. On or about February 7, 2021, FBI OCE 1 sent a more completed English translation and an Arabic transcript to CARPENTER, via CARPENTER's "ahadtalabah" account. These versions had timestamps added to match the times in the video. CARPENTER replied with an image of two fighters hugging and then wrote, "It looks good naam [yes] / Will get back to you in sha Allah."
- 75. On or about February 11, 2021, CARPENTER wrote, "The akh [brother] said there many mistakes and many parts left out so he's had to redo it." A few hours later, CARPENTER added, "He should be finished today in sha Allah."
- Alhamdulillah [praise be to Allah] / Just needs a little editing." CARPENTER added, "This video from sayna [Sinai] shouldn't have a priority to translate. The one from Khurasan that explains the deviance of the Taliban or from Yemen explaining the deviance of AQ should have been." FBI OCE 1 agreed with CARPENTER's interest in these additional ISIS videos and stated that they [diwan] wanted to work on this ISIS video series next. CARPENTER responded, "Because going through this sayna [Sinai] one I don't see any need to translate over those / But tayyib [Okay] / Las bas [There is nothing wrong]."
- 77. On or about February 14, 2021, CARPENTER sent FBI OCE 1 a Microsoft Word document containing a complete English translation of ISIS's "Bleeding Campaigns" video

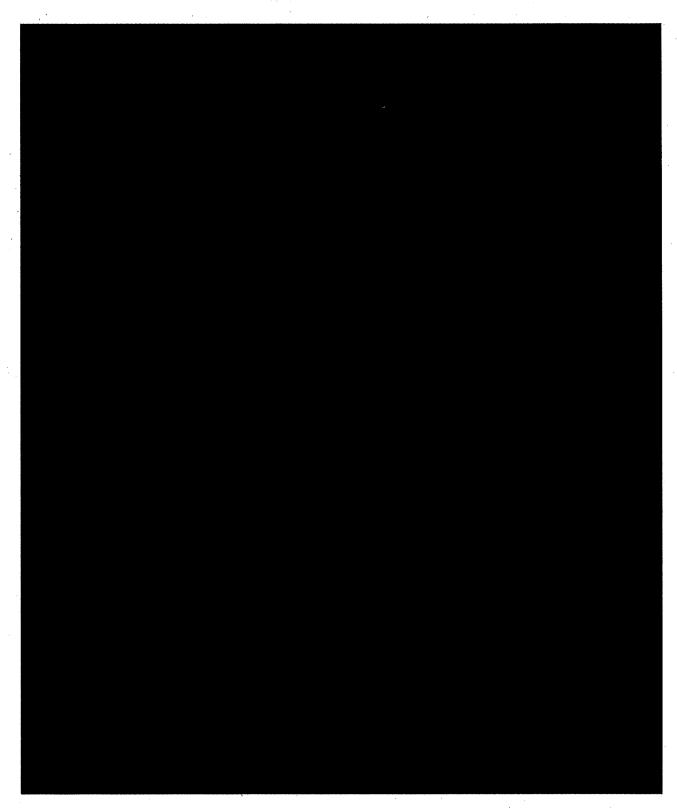
believing the translation would be provided to ISIS in support of its project to reinitiate ISIS

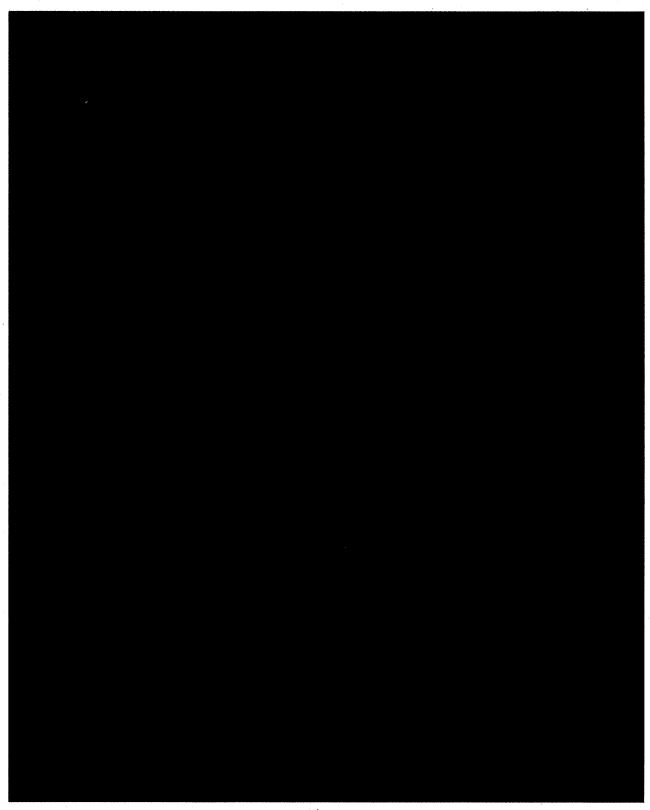
Media Organization 2. CARPENTER wrote, "From the akh [brother]." The translation

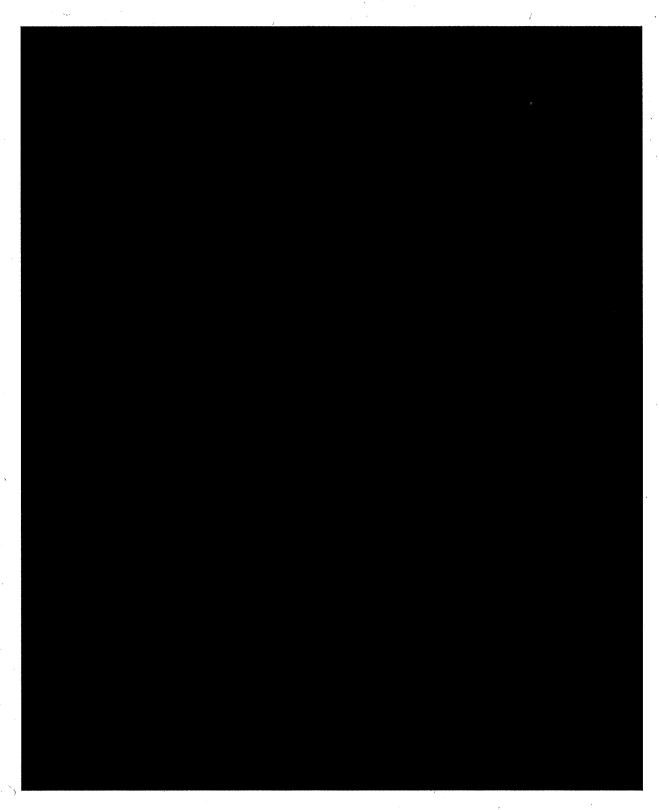
contained numerous edits and additions to nearly every paragraph of the draft English translation
that FBI OCE 1 provided to CARPENTER.

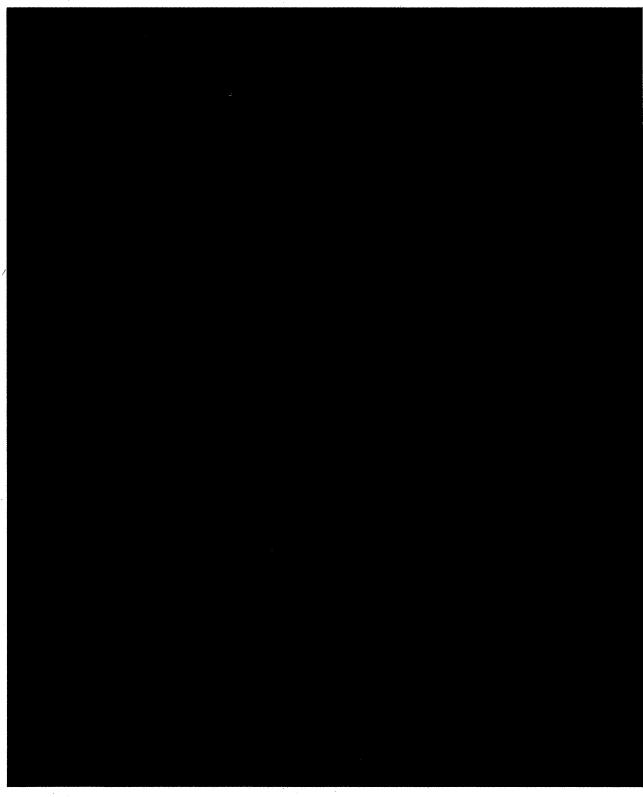
- 78. The translation provided by CARPENTER describes ISIS's perceived success against Egyptian forces in part by stating that ISIS has stood up "against these successive campaigns during these past years, as they have repelled their attacks against their honors and Deen, while inflicting great loss upon the apostates."
- 79. The translation contains a threat to local tribesmen not to cooperate with ISIS's enemies. In connection with the execution of an alleged spy, the translation states, "... the sword will not be back in its sheath, until rivers of blood shall run, by Allah, we will not be satisfied except with your disappearance, o mushrikeen, as you are kuffar" The translation goes on to say, "And this is one of your agents, whom you sent to spy on the mujahideen, as this the fate of every apostate traitor." The translation further warns, "Here the hell upon the kuff has come And the curtain of panic has come down And upon the kuffar a fire of panic has descended ... Whoever shows enmity towards our guidance In the flame of war he is humiliated."
- 80. In response to FBI OCE 1 thanking him for sending the translation,

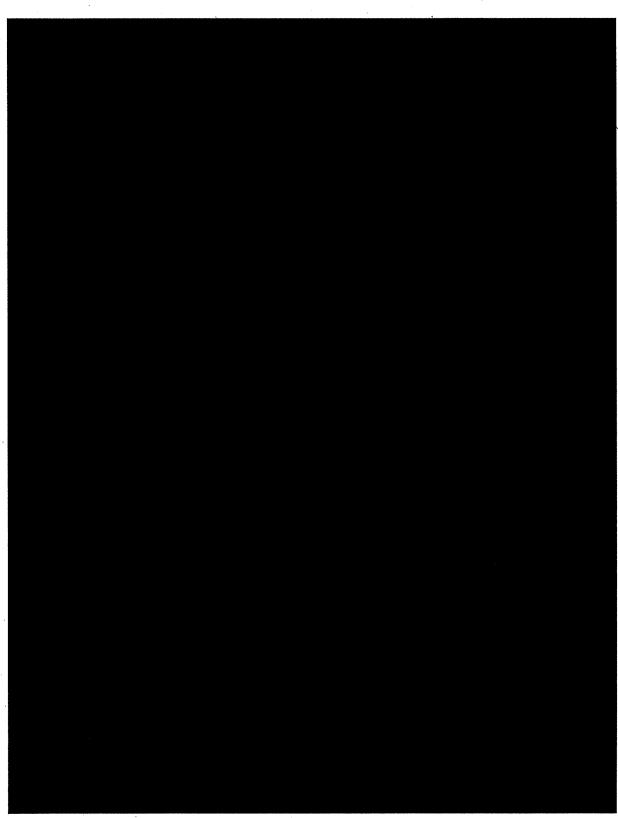
 CARPENTER wrote, "Wa jazak [and [Allah] reward you]," and then posted a heart emoji and a
 tawhid emoji, which is one finger pointed up in representation of the oneness of God.

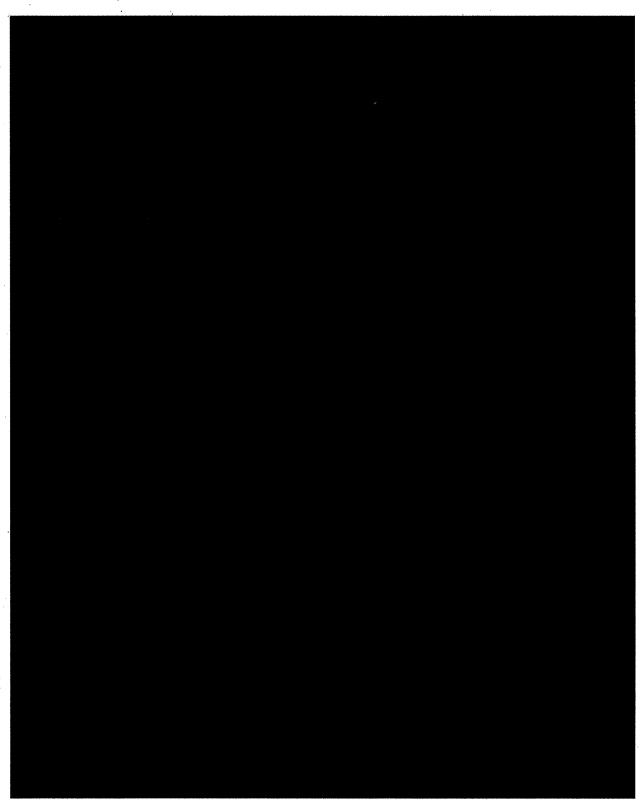


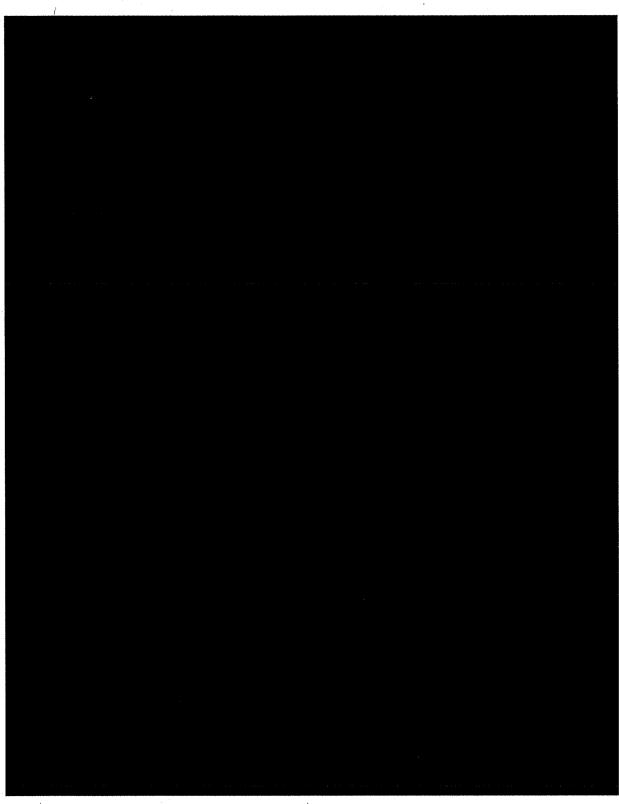


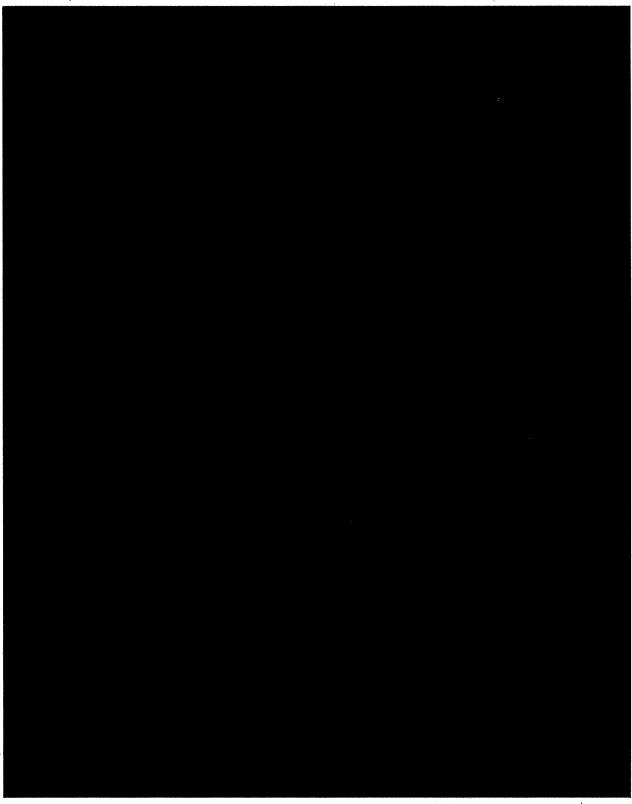


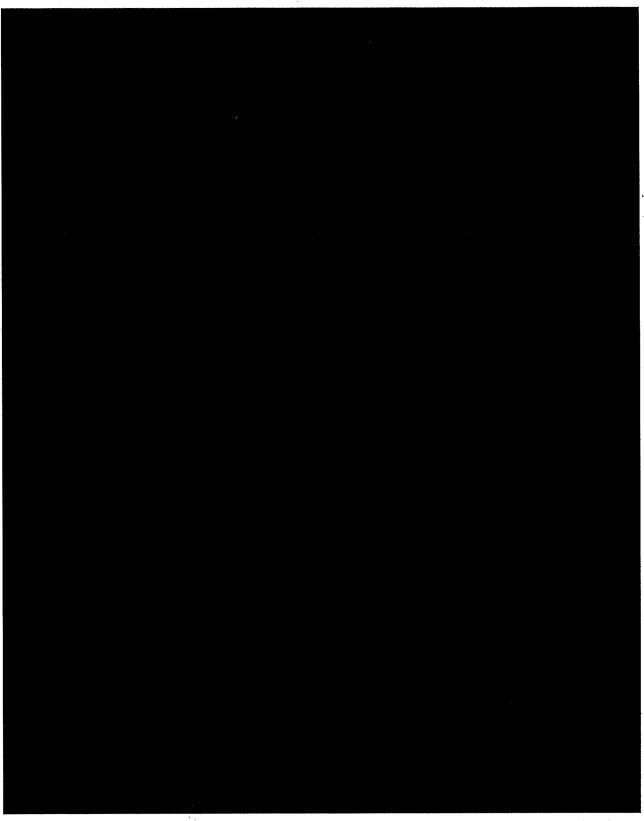


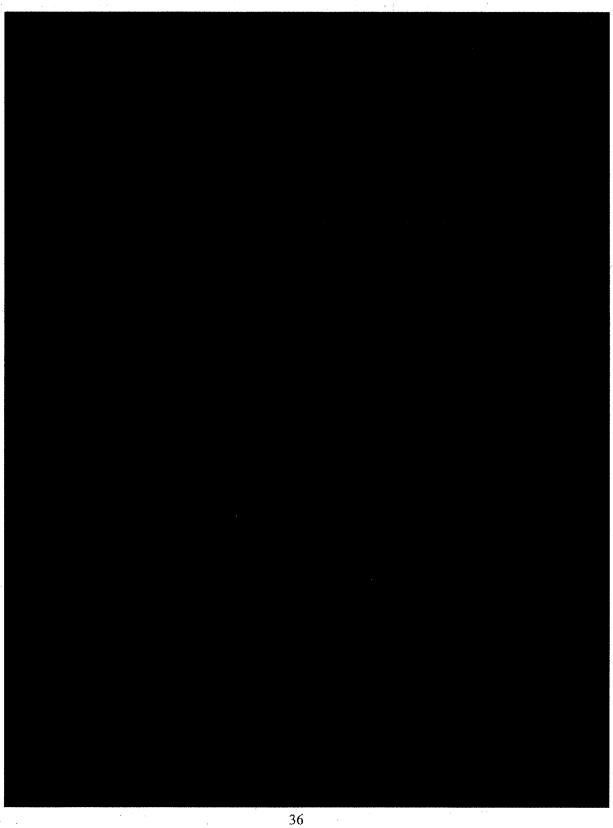


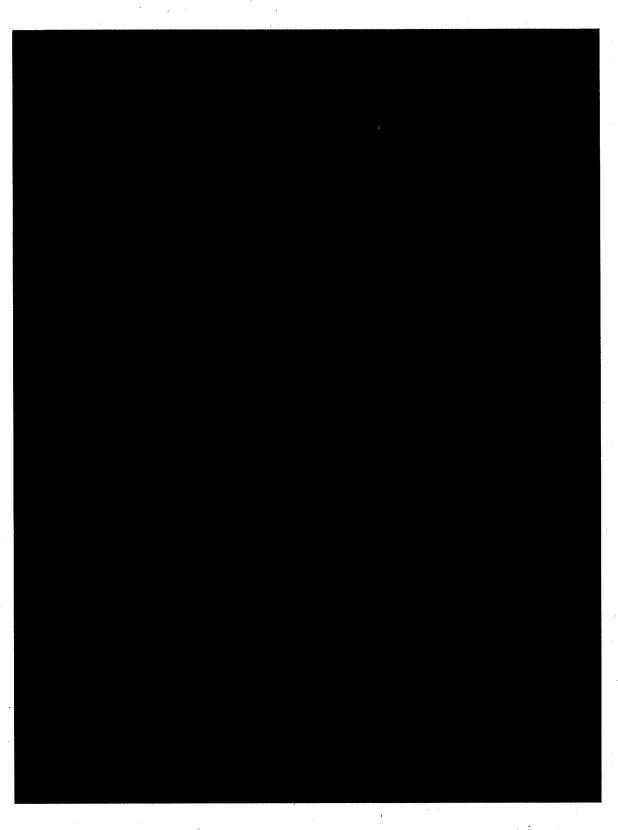


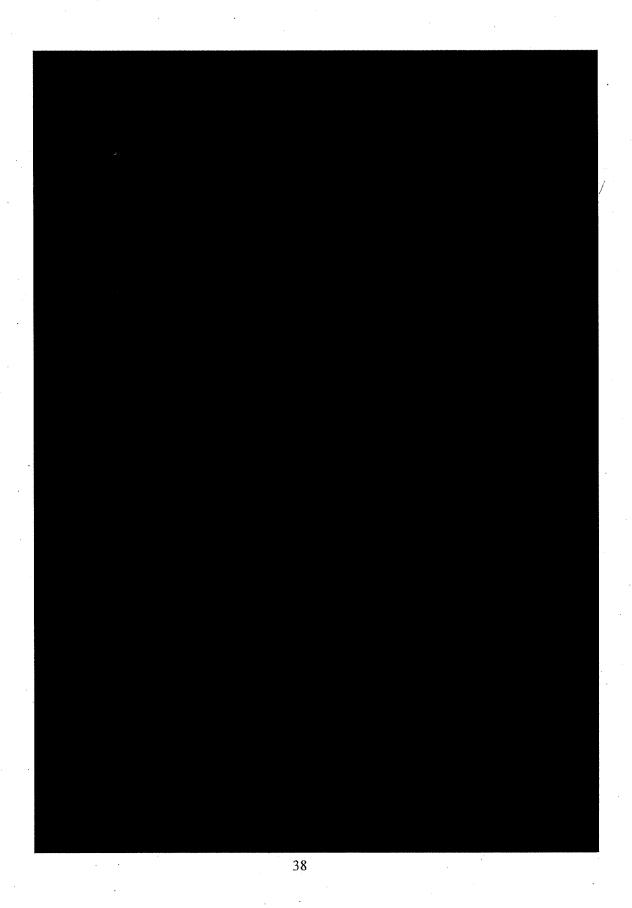


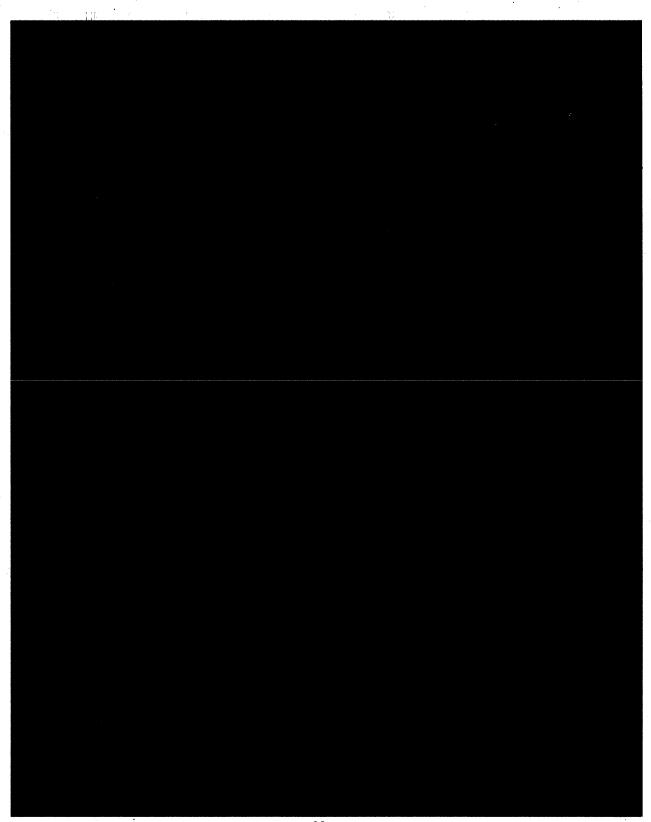


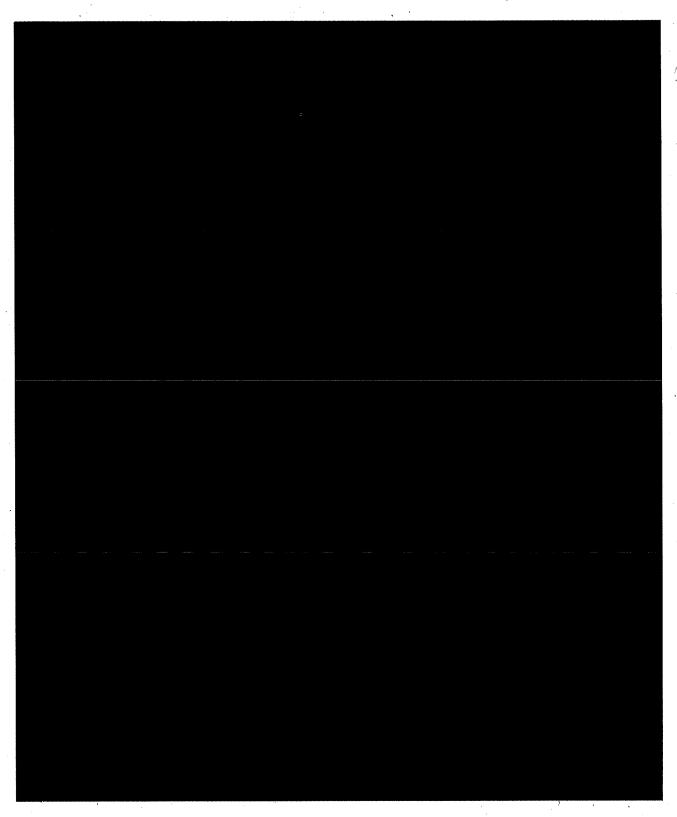


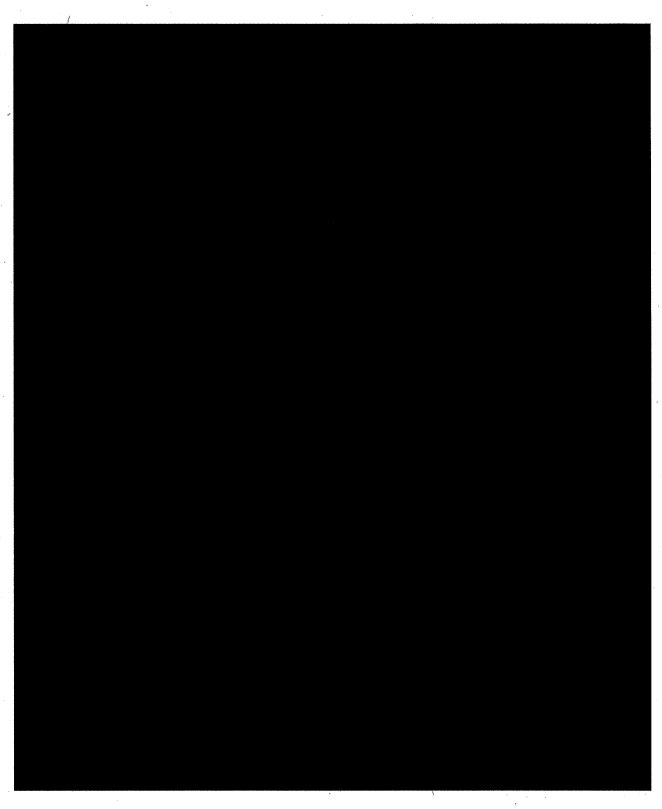


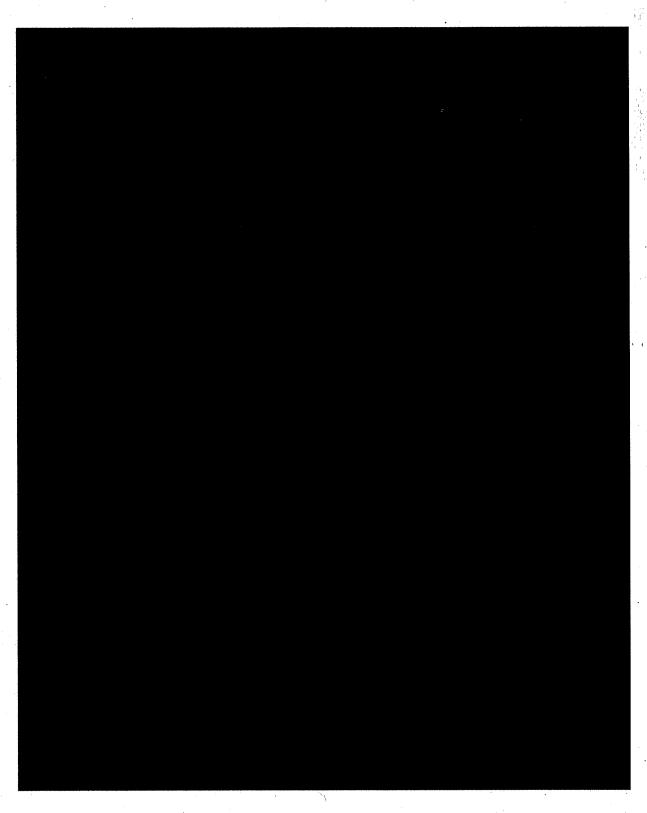


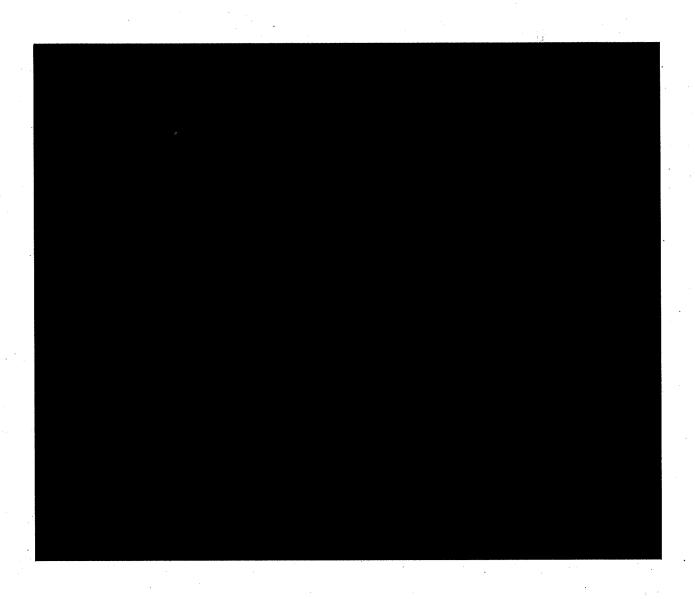












CONCLUSION

123. Based on the foregoing, I submit that this affidavit supports probable cause for a warrant to search the **Subject Property** described in Attachments A-1, A-2, A-3, and A-4 respectively; and seize the items described in Attachment B.

Respectfully submitted,

Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on March 2, 2021.

United States Magistrate Judge